IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

TITUS HENDERSON,

Plaintiff,

v.

Case No. 18-CV-555

DEAN STEINSBERG, et al.,

Defendants.

STATE DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

NOW COME State Defendants by their attorneys, Attorney General Joshua L. Kaul and Assistant Attorneys General Christopher J. McElgunn and Rebecca A. Paulson, and hereby move the Court, pursuant to Fed. R. Civ. P. 56, for an order of summary judgment dismissing this lawsuit.

The grounds for this motion are set forth in the accompanying State

Defendants' Brief in Support of Motion for Summary Judgment, State

Defendants' Proposed Findings of Fact, and Declarations.

Plaintiff is notified that this motion is based on Fed. R. Civ. P. 56, a copy of which is attached to this motion. In addition, accompanying this motion is a copy of Civil L. R. 7 and Civil L. R. 56.

Plaintiff is further notified that declarations and any other documents accompanying this motion are incorporated by reference herein. Any factual assertion in the declarations (and other admissible proof) submitted or referred to in support of the defendants' motion will be accepted by the judge as true unless you submit affidavits or declarations or other admissible documentary evidence contradicting such assertion. Failure to oppose the defendants' declarations (or other admissible proof) with your own affidavits or declarations (or other admissible proof) may result in entry of judgment against you.

Dated this 19th day of June, 2020.

Respectfully submitted,

JOSHUA L. KAUL Attorney General of Wisconsin

<u>s/Christopher J. McElgunn</u> CHRISTOPHER J. MCELGUNN Assistant Attorney General State Bar #1092057

REBECCA A. PAULSON Assistant Attorney General State Bar #1079833

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